IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

Katherine Bradacs and Tracie Goodwin,) Civil Action No. 3:13-cv-02351-JMC
Plaintiffs,))
v.) CONSENT MOTION FOR
) EXTENSION OF TIME
Nimrata ("Nikki") Randhawa Haley, in her)
official capacity as Governor of South)
Carolina; Alan M. Wilson, in his official)
Capacity as Attorney General,)
)
Defendants.)
)

Pursuant to Local Rule 6.01, DSC, the parties hereby move by consent for an enlargement of time to serve and file dispositive motions in this case.¹ They include the following information required by Rule 6.01:

(1) Current deadline:

April 11, 2014 (Cross-motions)

(2) Whether the deadline has been previously extended:

Yes

(3) The number of additional days requested and the proposed date of the new deadlines:

14 additional days. Proposed new deadline: April 25, 2014.

(4) Whether the extension requested would affect other deadlines: No

¹ The Defendants make this motion while maintaining and without waiving their currently pending Motion for Stay and to Hold Deadlines in Abeyance. Counsel for Plaintiffs do not consent to that Motion.

The parties agree to this additional time to address the significant issues in this case.

Undersigned counsel also has travel scheduled between now and the current deadline.

This Motion is being efiled by Emory Smith, as counsel for his clients, the Defendants Governor and the Attorney General, but the Motion is submitted on behalf of all parties to this case.

Respectfully submitted,

ALAN WILSON Attorney General Federal ID No.10457

ROBERT D. COOK Solicitor General Federal ID No. 285 Email: BCOOK@SCAG.GOV

/s/ J. Emory Smith, Jr. J. EMORY SMITH, JR. Deputy Solicitor General Federal ID No. 3908

IAN P. WESCHLER Assistant Attorney General Federal ID No. 11744 Email: ESMITH@SCAG.GOV

Post Office Box 11549 Columbia, South Carolina 29211 Phone: (803) 734-3680 Fax: (803) 734-3677

Counsel for Defendants Governor and Attorney General

[Plaintiffs' Counsel's Signature block next page]

Carrie A. Warner
Federal ID Number 11106
Warner, Payne & Black, LLP 1531
Blanding Street
Post Office Box 2628
Columbia, South Carolina 29201 (803)
799-0554
Facsimile: (803) 799-2517
carriewarner@wpb-law.net

John S. Nichols
Federal ID Number 11598 Bluestein,
Nichols, Thompson & Delgado, LLC
1614 Taylor Street Post Office
Box 7965
Columbia, South Carolina 29202 (803)
779-7599
Facsimile: (803) 771-8097
jsnichols@bntdlaw.com

Laura W. Morgan Family Law Consulting 108 5th St. SE, Suite 204 PO Box 497 Charlottesville, Virgina 22902 goddess@famlawconsult.com

Counsel for Plaintiffs

April 3, 2014